

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

LARRY SWANSON,  
Individually and on Behalf of All Others  
Similarly Situated,

Plaintiff,

Case No. 15 Civ. 5383 (ENV) (TAM)

v.

MANHATTAN BEER DISTRIBUTORS,  
LLC and SIMON BERGSON,

Defendants.

**PLAINTIFF'S PROPOSED DISCOVERY SCHEDULE**

1. Motions to compel on Plaintiff's overtime claim: May 31, 2024
  - a. Plaintiff to circulate initial draft by May 15, 2024
  - b. Each party to circulate a responsive draft within 3 business days of receiving a draft from the opposing party
2. Motions to compel on Plaintiff's deductions claim: May 31, 2024
  - a. Plaintiff to circulate initial draft by May 15, 2024
  - b. Each party to circulate a responsive draft within 3 business days of receiving a draft from the opposing party
3. Parties to substantially complete document discovery not subject to Plaintiff's motion to compel: June 14, 2024
4. Parties to substantially complete document discovery subject to resolution of Plaintiff's motions to compel: July 19, 2024
5. Fact depositions to be completed: August 30, 2024
6. Initial Expert Reports to be served: September 13, 2024
7. Rebuttal Expert Reports to be served: September 27, 2024
8. Expert depositions to be completed: October 11, 2024
9. Motion for Class Certification (on both claims): November 1, 2024
  - a. Opposition Due: December 2, 2024
  - b. Reply Due: December 20, 2024
10. The above schedule may be modified by application to the Court